



National Association of Broadcasters

Television and Radio Political Action Committee
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December 2, 1998

Mr. Matthew J. Petusky
Reports Analyst
Reports Analysis Division
Federal Election Commission
999 E Street, NW
Washington, DC 20463

Identification Number: C00009985

Reference: September Monthly Report (8/1/98-8/31/98)

Dear Mr. Petusky:

I am writing in response to your letter of November 18th as supplemented by our telephone conversations of Friday, November 19th and Tuesday, November 24th. In an effort to provide a complete and thorough response to the Commission's correspondence, we also contacted Ms. Susan Propper, Assistant General Counsel for Regulations of the Federal Election Commission and our outside Counsel, who is Mr. William B. Canfield III of William & Jensen.

As per our conversation with Susan Propper this morning, the report discloses a \$1,082.14 payment to our connected organization for an "in-kind" contribution to Cubin for Congress. The payment to our connected organization for tickets and parking were for a fundraising event held on July 21, 1998. The payment to the NAB was made on August 17, 1998. Ms. Propper indicated that such a payment should not follow the date that the "in-kind" contribution was made, but must precede that date. Based upon the Commission's direction, all further "in-kind" contributions of this nature will be paid to our connected organization in advance of the fundraising event.

As a result of our conversation this morning, an amendment must also be made to the May Monthly report. The in-kind contribution of \$1,236.00 to Bennett for Senate '98 directed to the 1998 General Election should be re-designated to the 1998 Primary Election.

Your review of the report discovered a typographical error on Line 23, Column B of the Detailed Summary Page and an incorrect total for Line 8, Column B of the Summary Page. Also, in re-examining the September Detailed Summary Page, Line 28 D and Line

29 have been reversed. Subsequently, the October Monthly and Pre-General Line 28 D and Line 29 must be amended. Therefore, the following is submitted:

- Line 23, Column B - \$310,390.08 (September Monthly)
- Line 8, Column B - \$221,026.97 (September Monthly)
- Line 28 D - \$3,000.00 (September Monthly, October Monthly & Pre-General)
- Line 29 - \$0 (September Monthly, October Monthly & Pre-General)
- Bennett for Senate '98 - \$1,236.00 in-kind contribution dated 4/28/98 re-designated to the Primary Election (May Monthly)

We look forward to receiving a sample copy of the "in-kind" contribution reporting specifications. If you have any questions, please contact me at (202) 429-5319. Thank you very much for your assistance in this matter.

Regards,



Rae Ann Bevington
TARPAC Manager

Cc: Mr. James C. May, Treasurer, TARPAC
Mr. William B. Canfield, III, Esq., William & Jensen, P.C.
Ms. Susan Propper Esq., Assistant General Counsel for Regulations, FEC

Federal Election Commission

**ENVELOPE REPLACEMENT PAGE
FOR INCOMING DOCUMENTS**

The Commission has added this page to the end of this filing to indicate how it was received.

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